

June 17, 2008

Mr. Christopher A. Whyrick  
Reports Analysis Division  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Dear Mr. Whyrick:

The Rudy Giuliani Presidential Committee, Inc. (hereinafter "Committee"), FEC ID# C00430512, is in receipt of your Request for Additional Information (RFI) dated June 3, 2008 referencing the March Monthly FEC Report (3/1/08 - 3/31/08). The Committee's response follows.

Schedule B-P

Schedule B-P - Void Checks

Under 11 CFR 104.9 and other available FEC guidelines as referenced above, the Committee can find no indication that "void check" is not a valid purpose when reporting transactions of this nature. With regard to the transactions questioned, the Committee has reported checks that were issued to donors in a prior period and, because they were determined to be either duplicate or lost by the donor, these checks were voided during the reporting period so that the Committee's reported cash on hand figures agreed with its internal records. It is the Committee's policy to make repeated efforts to locate contributors in order to comply with all applicable federal regulations relative to contribution refunds. At a point in time that the Committee has exhausted all means of locating contributors to which a contribution refund is required, it will disgorge any funds which it is not allowed to retain to the United States Treasury or to an organization described in 2 U.S.C. 170(c).

Schedule D-P

The Committee will amend Schedule D to reflect the clerical error referenced in your letter.

Sincerely,

John H. Gross  
Treasurer

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